(d)   a plurality of modems for converting a dual-tone multi-frequency (DTMF) signal into at least one digit.

Please add the following claims:

24.   The system of claim 2, further comprising:

(e)   a conversion module that transforms a first digit and a second digit into a letter, wherein the first digit identifies a group of letters and the second digit identifies the letter within the group.

25.   The system of claim 10, further comprising:

(e)   a conversion module that transforms a first digit and a second digit into a letter, wherein the first digit identifies a group of letters and the second digit identifies the letter within the group.

26.   The system of claim 16, further comprising:

(e)   a conversion module that transforms a first digit and a second digit into a letter, wherein the first digit identifies a group of letters and the second digit identifies the letter within the group.

REMARKS

Currently, claims 1-23 are pending. No amendments to the claims have been previously submitted.

Claims Rejections

35 USC §102(b) Rejections

Claims 1-8 and 15-20 are rejected under 35 USC §102(b) as being anticipated by Shaffer (U.S. Patent No. 5,901,214). Regarding claim 1, Examiner asserts that element (a) is anticipated by the following:

an automated call handler (213 on FIG. 2) coupled to the telephone network (column 28, lines 5-7) and capable of receiving a request (column 28, line 19 "a telephone call") for credit history information from a caller (column 28, line 21) via the telephone network (column 28, lines 19-24), querying the caller for details about the request (column 28, lines 39-46), accessing the requested credit history information (column 28, lines 24-27), and providing the requested credit history information to the caller in accordance with the request (column 28, lines 27-32)

Under 35 USC §§102, every limitation of a claim must identically appear in a single prior art reference for it to anticipate the claim." *PPG Indus., Inc. v. Guardian Indus. Corp.*, 75 F.3d 1558, 1566. Applicant respectfully submits that Shaffer, as cited, does not teach what is claimed in element (a). The Examiner asserts that "for credit history information from a caller is taught by Shaffer as referenced by column 28, line 21. However, column 28, lines 19-24 states,

> A telephone call that initiates at a calling location may be routed through the network 212 by use of the call processing center 213 and/or **information about a caller**, servicing location, or advertiser through the network 212 by use of the center 213. (Emphasis added.)

The limitation "for credit history information from the caller" does not "identically appear in a single prior art reference" as cited by the Examiner. Moreover, the Examiner asserts that "querying the caller for details about the request" is taught by Shaffer as referenced by column 23, lines 39-46. However, column 23, lines 39-46 states,

> There are three major individual databases 114 that are indexed by social security number: TRW, Equifax and TransUnion (TU). The preferred database is the TU database. Once an individual's social security number has been retrieved from above (database 112), it is a basic process to use the social security number as a means of retrieving credit and public record data associated with the social security number from the TU database.

Applicant submits that the above teaching does not teach "querying the caller for details about the request and thus Shaffer does not anticipate claim 1. Applicant requests for reconsideration of claim 1.

Claims 2-8 are dependent upon independent claim 1. Thus, Applicant submits that claims 2-8 are not anticipated by Shaffer. Moreover, regarding claim 3, Applicant further submits that Schaeffer, as referenced by column 23, lines 35-54 does not teach or even suggest "the gateway terminal has a security checker for ensuring access to the searchable database by authorized callers." Regarding claim 4, Applicant further submits that Shaffer, as referenced by column 3, lines 16-31,

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does not teach "converting the digits into at least one American Standard Code for Information Interchange (ASCII) character." Shaffer, as cited, teaches:

> There is also primitive technology available to scan and translate video images **in the form of hand-written messages and typed characters, words, and sentences** into digital data, such as the ASCII character set. (Emphasis added.)

Thus, Applicant requests for reconsideration of claims 2-8.

Applicant submits that claim 15 is not anticipated by Shaffer for the reasons presented above regarding claim 1 and requests for reconsideration. Claims 16, 17, 18, 19, and 20 are dependent on independent claim 15. Thus, Applicant submits that claims 16, 17, 18, 19, and 20 are not anticipated by Shaffer and requests for reconsideration.

35 USC §103(a) Rejections

Claims 9-14 and 21-23 are rejected under 35 USC §103(a) as being unpatentable over Shaffer in view of Lowery (U.S. Patent No. 6,446,111). The Examiner presents the motivation for combining Shaffer and Lowery by the following:

> It would have been obvious to one of the ordinary skill in the art at the time the invention was made to add a database with book availability of Lowery in the invention of Shaffer.

> The modification of the invention would offer the capacity of having a book availability information data such as the user would be able to access this information and buy a book.

However, as stated in MPEP 2141, "The references must be viewed without the benefit of impermissible hindsight vision afforded **by the claimed invention**." (Emphasis added.) Applicant submits that the Examiner is using what is claimed in the claimed invention of claim 9 in order to provide motivation to combine prior art references in order to form the patentee's claimed invention. Thus, in regard to claim 9, Applicant submits that the Examiner has not provided prima facie obviousness because the Examiner has not shown suggestion or motivation. Moreover, the Examiner asserts that "querying the caller for details about the request" is taught by Shaffer as referenced by

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column 23, lines 39-46. However, as previously discussed, Applicant submits that the above teaching does not teach "querying the caller for details about the request." Thus, Applicant requests for reconsideration of claim 9. Claims 10-14 are dependent upon independent claim 9. Thus, Applicant submits that claims 10-14 are patentable over Shaffer in view of Lowry. Moreover, regarding claim 11, Applicant further submits that Schaeffer, as cited at column 23, lines 35-54, does not teach or even suggest that "the gateway terminal has a security checker for ensuring access to the searchable database by authorized callers." Regarding claim 12, Applicant further submits that Shaffer, as cited at column 3, lines 16-31, does not teach "converting the digits into at least one American Standard Code for Information Interchange (ASCII) character." Thus, Applicant requests reconsideration of claims 9-14. Regarding claim 21, as with claim 9, Applicant submits that the Examiner has not shown prima facie obviousness. Thus, Applicant requests for reconsideration of claim 21. Regarding claim 22, as with claim 9, Applicant submits that the Examiner has not shown prima facie obviousness. Moreover, Shaffer, cited at column 3, lines 16-31, does not teach or even suggest "receiving **a plurality of character responses** from the caller to form a request, wherein each response represents **a single ASCII character.**" (Emphasis added.) Thus, Applicant requests for reconsideration of claim 22. Claim 23 is dependent upon claim 22. Moreover, Shaffer, cited at column 3, lines 16-31, does not teach or even suggest "receiving **a plurality of two-character responses** wherein each two-character response represents **a single ASCII character.**" (Emphasis added.) Thus, Applicant requests for reconsideration of claim 23.

Claims 24, 25, and 26 are added. All the claims are based upon information disclosed in the present patent application. All objections and rejections having been addressed. Hence, it is respectfully submitted that the present application is in condition for allowance, and a notice to that effect is earnestly solicited.

Respectfully submitted,

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